

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

PATRICIA DeBIASE and	:	
JEFF DeBIASE,	:	
Plaintiffs	:	NO. 06-CV-1278
v.	:	
HERSHEYPARK and HERSHEY	:	CIVIL ACTION-LAW
ENTERTAINMENT & RESORTS	:	
CO. (HERCO, INC),	:	(JUDGE JONES)
Defendants.	:	
	:	CROSS-MOTION FOR AN ORDER
		PERMITTING COUNSEL TO WITHDRAW

TO: Susan Metcalfe
McNees, Wallace & Nurick
100 Pine Street
Harrisburg, PA 17108

Keith J. Roberts, Maggiano DiGirolamo, Lizzi & Roberts, P.C., hereby cross-moves in reply to defendant's Motion to Compel and request sanctions on behalf of Hershey Entertainment and Resorts Company, for an Order to permit Keith J. Roberts to withdraw as counsel to plaintiffs.

In support of a Cross-Motion to Permit Counsel to Withdraw and Modify the Current Case Management Order, movant, Keith J. Roberts, Maggiano DiGirolamo, Lizzi and Roberts, P.C., shall rely upon the following documents, annexed to the instant application and served herewith, as follows:

- 1) Certification of Keith J. Roberts, Esq., Maggiano DiGirolamo, Lizzi & Roberts, P.C.;
- 2) Certification of Michael Maggiano, Esq., Maggiano DiGirolamo, Lizzi & Roberts, P.C.;

- 3) Plaintiff's Answers to Interrogatories served by Defendant Hershey Entertainment & Resorts Company; (Plaintiff's Brief, Exhibit A)
- 4) Plaintiff's Response to Document Demand served by Hershey Entertainment & Resorts Company; (Plaintiff's Brief, Exhibit B)

WHEREFORE, counsel to Plaintiffs, Keith J. Roberts, Esq., Maggiano, DiGirolamo, Lizzi & Roberts, P.C., based upon the Certifications of counsel hereby moves before the Court seeking an Order to permit counsel to Plaintiff to withdraw as counsel.

MAGGIANO, DiGIROLAMO
LIZZI & ROBERTS, P.C.

By: s/KEITH J. ROBERTS, ESQ.
Attorney ID No.(NJ) KRO 0547
Maggiano, DiGirolamo Lizzi & Roberts, PC
201 Columbia Avenue
Fort Lee, New Jersey 07024
(201) 585-9111

Attorneys for Plaintiffs

DATED: April 8, 2007